

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

BRITTANY E. MARTIN,

Plaintiff,

Case No.: 1:24-cv-00072

v.

HON. Hala Y. Jarbou

HENN LESPERANCE PLC, *et al.*,

Defendants.

EXPEDITED CONSIDERATION REQUESTED

**PLAINTIFF’S MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF HER
MOTION FOR ISSUANCE OF SUMMONS AND SERVICE OF PROCESS TO NEW
DEFENDANTS THOMAS C. WALKER, WILLIAM HENN, AND ANDREW CASCINI**

Pursuant to W.D. Mich. LCivR 7.3(c), Plaintiff, Ms. Brittany E. Martin, respectfully moves the Court for leave to file the attached Reply in support of her Motion for Issuance of Summons and Service of Process to New Defendants Thomas C. Walker, William Henn, and Andrew Cascini. (the “Motion for Summons”) (ECF No. 68). In support, Ms. Martin states:

Defendants’ Response in Opposition (ECF No. 72) mischaracterizes Ms. Martin’s compliance with procedural rules and misstates and omits crucial factual background. It also contains false accusations and misinterpretations of fact and law, which require correction to ensure an accurate and fair adjudication of this motion. For example:

- Defendants falsely accuse Ms. Martin of:
 - failing to comply with Local Rule 7.1(d)(ii). (*Id.*; PageID.1591);
 - consistently failing and outright refusing to comply with procedural rules. (*Id.*; PageID.1592).

- engaging in “protracted motion practice” *Id.*
- viewing U.S. Marshals Service “as an expendable resource.” (PageID.1593).
- Defendants falsely characterize Ms. Martin’s motions as “improper and unnecessary” *Id.*
- Defendants obscure the relevant fact that they always intended to oppose this motion and that within hours of her filing the motion, Defendants’ counsel issued Ms. Martin an ultimatum to either withdraw her motion and agree to stay the issue of issuing and service the summons until after their Motion to Strike and dismiss are adjudicated...or face their opposition.
- Defendants obscure their true motive in opposing issuance and service of summons onto the New Defendants, which is to maintain their false narrative about Tom Walker’s role in the actions giving rise to this lawsuit and avoid the ethical scrutiny that would arise from representing multiple defendants with diverging and conflicting interests.

Allowing the attached Reply will clarify the facts, correct misrepresentations, and support a fair adjudication. It will not delay proceedings or prejudice Defendants.

Ms. Martin’s proposed Reply is attached as **EXHIBIT A**.

A proposed order granting Ms. Martin’s motion for leave to file the proposed Reply is attached as **EXHIBIT B**.

WHEREFORE, Plaintiff, Ms. Brittany E. Martin, respectfully requests this Honorable Court grant her leave to file the proposed Reply and any such other and further relief the Court deems just and proper.

Respectfully submitted,

Brittany E. Martin
Plaintiff

Dated: June 25, 2024

By: /s/ Brittany E. Martin
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